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June 24, 2014
Via email and hardcopy

Tammy McWade
Tammy.McWade@dep.state.fl.us

Engineer Specialist IV
Florida Department of Environmental Protection
Office of Permitting and Compliance
Division of Air Resource Management

**RE: Response to Request for Additional Information
Initial Title V Application
Florida Power Development, LLC; Facility ID: 0530380
Location: Brooksville, Florida**

Dear Tammy,

This letter is a response to the Request for Additional Information sent on April 9, 2014 regarding Permit No. 0530380-002-AV for the Florida Power Development, LLC facility in Brooksville, FL. I have copied the itemized requests (identified by number items) below with responses below each item. Note that some of the responses involve revisions to the application and therefore the responses refer to enclosed documents.

- 1) Please provide the CAIR CEMS certification report and Best Management Plan identified in the application and required to be submitted with this initial Title V air operation permit application.

The attached CAIR form that was requested is attached to this submittal. The CEMS certification report and BMP was submitted in the original application as discussed by telephone and provided in email.

- 2) Please provide the reasonable precautions that will be taken to prevent emissions of unconfined particulate matter at this facility.

Several precautions will be taken to prevent emissions of unconfined particulate matter at this facility. These precautions include:

1. *Paving and maintenance of roads and parking areas.*
2. *Application of water to control emissions from activities such as demolition or construction.*
3. *Application of water to unpaved roads.*

4. *Scheduled removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment.*
5. *Landscaping or planting of vegetation.*
6. *Use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter, when possible.*
7. *Confining abrasive blasting where possible.*
8. *Enclosure or covering of conveyor systems.*
9. *Water supply lines, hoses and sprinklers will be located reasonably near all materials and stockpiles.*
10. *All plant operators shall be trained in basic environmental compliance and shall perform visual inspections of materials before handling.*
11. *Bulk transport trucks leaving the plant shall travel through a tire wash designed to remove particulate matter from the vehicle tires before traveling on the facility's access roadways.*
12. *The main access road leading to the plant shall be cleaned with a mechanical broom sweeper on an as needed basis.*

3) Please provide a Compliance Assurance Monitoring Plan for emissions of particulate matter for the woody biomass-fueled grate suspension boiler (EU 002) and any another applicable pollutant or pollutant-specific emission unit pursuant to 40 CFR 64.

Please see the attached Document - Attachment 2.

4) Please provide the applicable requirements of NESHAP Subpart DDDDD of 40 CFR 63 that the woody biomass-fueled grate suspension boiler (EU 002) will be subject to in January 2016.

As specified in 40 CFR 63 Subpart DDDDD, beginning January 31, 2016, the existing woody biomass-fueled grate suspension boiler will be subject to the emission limitations outlined in Table 2 in Subpart DDDDD. This includes the following limitations:

<i>Pollutant</i>	<i>Emissions Limit, except during startup and shutdown</i>	<i>Alternative Output-Based Limits, except during startup and shutdown</i>
HCl	2.2E-02 lb per MMBtu of heat input	2.5E-02 lb per MMBtu of steam output or 0.27 lb per MWh
Mercury	5.7E-06 lb per MMBtu of heat input	6.4E-06 lb per MMBtu of steam output or 7.3E-05 lb per MWh
Filterable PM	5.1E-02 lb per MMBtu of heat input; or (6.5E-03 lb per MMBtu of heat input)	5.2E-02 lb per MMBtu of steam output or 7.1E-01 lb per MWh; or (6.6E-03 lb per MMBtu of steam output or 9.1E-02 lb per MWh)
CO	2,400 ppm by volume on a dry basis corrected to 3 percent oxygen, 3-run average; or (2,000 ppm by volume on a dry basis corrected to 3 percent oxygen, 10-day rolling average)	1.9 lb per MMBtu of steam output or 27 lb per MWh; 3-run average

- 5) The Air Construction Permit No. 0530380-001-AC identifies an ammonia slip limit of 10 parts per million by volume, dry (ppmvd) at 7% oxygen for the woody biomass-fueled grate suspension boiler (EU 002); however, the application does not identify this emission limit. Please provide this applicable limit and corresponding information as part of this application.

The application does not identify the ammonia slip limit of 10 parts per million by volume at 7% oxygen because the facility is requesting that this limit be removed through the simultaneous submission of an air construction permit. The original ammonia slip limit in the initial AC permit was listed as a reasonable assurance limit based on the SCR manufacturer's guarantee. Initial testing of the ammonia slip from the unit indicated non-detect values that are significantly less than the 10 ppmvd limit in the AC permit. The table from this test report that includes this data is attached to this RAI response. See Attachment 3. The complete report associated with this testing was submitted to DEP's regional office via email on May 15th, 2014.

Accordingly, since the ammonia slip limit is not a function of rule but, rather reasonable assurance, and the limit was more than met through initial testing, the facility is requesting the removal of this limit in the TV permit.

- 6) Please specify if the facility's generator or ditch pump is subject to 40 CFR 60 Subpart IIII, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) and/or 40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating ICE. Provide the following information, if applicable:
- a. Please identify the applicable regulations these engines are subject to.
 - b. Please specify how the facility is complying with the applicable subpart(s).
 - c. Are the engines new, existing, or reconstructed?
 - d. What is the HP (Hint: 1 HP = 0.7456 KW) of the stationary engines?
 - e. What year were the engines manufactured?
 - f. When did you commence construction (date the engines were ordered by the owner or operator) or reconstruction of your stationary engines?
 - g. Do you have a Manufacturers Certification for these engines?
 - h. What are the engines displacement (l/cyl)(Hint:1 cc = 0.001 l & V# = # cylinders)?
 - i. Are the engines equipped with emission control equipment?
 - j. What are the total hours of operation per year for each engine?
 - k. How many of the total hours are used during an emergency situation?
 - l. How many of the total hours are part of the demand response program?
 - m. Are the engines used for peak shaving, to generate income for a facility to supply power to an electrical grid, or supply power as a part of a financial arrangement with another entity?

The ditch pump that was in EU005 of the TV permit application is no longer in use at the facility. FPD would therefore like to eliminate that unit from the EU. The existing emergency generator will remain, however. This unit will not be subject to either Subpart IIII or Subpart ZZZZ. This is because of the engine's size and the nature of its use. As stated in 63.6590(b)(3)(iii), an existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii)(i.e., emergency demand response during a declared NERC alert level 2 or a deviation of voltage frequency of 5% or greater) does not have to meet the requirements of Subpart ZZZZ, including initial notification requirements. Due to the engines manufacturing date, Subpart IIII does not apply to this engine.

The requested information for the emergency engine is below:

- a. The engine is not subject to Subpart IIII or ZZZZ.*
- b. There will not be any applicable requirements for the facility due to this emergency engine.*
- c. Existing*
- d. 460 kW = approximately 610 hp. Please note that this value slightly lower than the current AC permit value of 500 kW = 670 hp. This revised value has been confirmed after further review by company personnel.*
- e. 1962*
- f. N/A*
- g. No*
- h. 3.925 liters/cylinder (31.4 Liters total, 8 Cylinders)*
- i. No*
- j. Total hours of operation are a function of maintenance and testing activities and unpredictable emergency need, which makes it impossible to predict hours of operation per year.*
- k. See j.*
- l. None*
- m. No.*

Additional Comments:

A modification to Condition 28 under EU002 in 0530380-001-AC is being requested. In this condition, Appendix CTR is referenced for the quarterly reporting format in the final sentence of this Condition. This information is not contained in Appendix CTR. Please replace this sentence with "See Figure 1 in 40 CFR 60.7(d) for the reporting format."

Please feel free to contact me at (352) 377-5822 or mlee@kooglerassociates.com and Larry Roberts at (352) 799-7881 or lroberts@deltapowerservices.com, if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in black ink, appearing to be 'ML', written over a light blue horizontal line.

Max Lee, Ph.D., P.E.
Koogler and Associates, Inc.
On behalf of Florida Power Development, LLC

cc: Terry Woodard, FPD (via email only - wwoodard@deltapowerservices.com)
Larry Roberts, FPD (via email only - lroberts@deltapowerservices.com)
Kelley Boatwright, (via email only - kelley.m.boatwright@dep.state.fl.us)
Ana Oquendo, EPA Region 4 (via email only - quendo.ana@epa.gov)
Natasha Hazziez, EPA Region 4 (via email only - hazziez.natasha@epa.gov)
Barbara Friday, DEP, OPC (via email only - barbara.friday@dep.state.fl.us)
Lynn Searce, DEP, OPC (via email only - lynn.searce@dep.state.fl.us)
Karl Seltzer, Koogler & Associates, (via email only - kseltzer@kooglerassociates.com)

Enc.

Attachment 1

Initial Title V Application
Florida Power Development, LLC; Facility ID: 0530380
Location: Brooksville, Florida

CAIR FORM

Clean Air Interstate Rule (CAIR) Part

For more information, see instructions and refer to 40 CFR 96.121, 96.122, 96.221, 96.222, 96.321 and 96.322; and Rule 62-296.470, F.A.C.

This submission is: New Revised Renewal

STEP 1

Identify the source by plant name and ORIS or EIA plant code

Plant Name: Florida Power Development (FPD), LLC Brooksville Power Plant	State: Florida	ORIS or EIA Plant Code: 10333
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STEP 2

In column "a" enter the unit ID# for every CAIR unit at the CAIR source.

In columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s).

For new units, enter the requested information in columns "e" and "f."

a	b	c	d	e	f
Unit ID#	Unit will hold nitrogen oxides (NO _x) allowances in accordance with 40 CFR 96.106(c)(1)	Unit will hold sulfur dioxide (SO ₂) allowances in accordance with 40 CFR 96.206(c)(1)	Unit will hold NO _x Ozone Season allowances in accordance with 40 CFR 96.306(c)(1)	New Units Expected Commence Commercial Operation Date	New Units Expected Monitor Certification Deadline
002	X	X	X	N/A	N/A

Brooksville Power Plant

STEP 3

Read the standard requirements.

CAIR NO_x ANNUAL TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR NO_x source and each CAIR NO_x unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.122 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CC, and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x source and each CAIR NO_x unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HH, shall be used to determine compliance by each CAIR NO_x source with the following CAIR NO_x Emissions Requirements.

NO_x Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x source and each CAIR NO_x unit at the source shall hold, in the source's compliance account, CAIR NO_x allowances available for compliance deductions for the control period under 40 CFR 96.154(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x units at the source, as determined in accordance with 40 CFR Part 96, Subpart HH.
- (2) A CAIR NO_x unit shall be subject to the requirements under paragraph (1) of the NO_x Requirements starting on the later of January 1, 2009, or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.170(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR NO_x allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Requirements, for a control period in a calendar year before the year for which the CAIR NO_x allowance was allocated.
- (4) CAIR NO_x allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FF and GG.
- (5) A CAIR NO_x allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR Part, or an exemption under 40 CFR 96.105 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR NO_x allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EE, FF, or GG, every allocation, transfer, or deduction of a CAIR NO_x allowance to or from a CAIR NO_x unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x unit.

Excess Emissions Requirements.

If a CAIR NO_x source emits NO_x during any control period in excess of the CAIR NO_x emissions limitation, then:

- (1) The owners and operators of the source and each CAIR NO_x unit at the source shall surrender the CAIR NO_x allowances required for deduction under 40 CFR 96.154(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

- (1) Unless otherwise provided, the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 - (i) The certificate of representation under 40 CFR 96.113 for the CAIR designated representative for the source and each CAIR NO_x unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 - (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program.
 - (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Annual Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program.
- (2) The CAIR designated representative of a CAIR NO_x source and each CAIR NO_x unit at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, including those under 40 CFR Part 96, Subpart HH.

Brooksville Power Plant

STEP 3, Continued

Liability.

- (1) Each CAIR NO_x source and each CAIR NO_x unit shall meet the requirements of the CAIR NO_x Annual Trading Program.
- (2) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x source or the CAIR designated representative of a CAIR NO_x source shall also apply to the owners and operators of such source and of the CAIR NO_x units at the source.
- (3) Any provision of the CAIR NO_x Annual Trading Program that applies to a CAIR NO_x unit or the CAIR designated representative of a CAIR NO_x unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, a CAIR Part, or an exemption under 40 CFR 96.105 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x source or CAIR NO_x unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR SO₂ TRADING PROGRAM

CAIR Part Requirements.

- (1) The CAIR designated representative of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall:
 - (i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.222 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and
 - (ii) [Reserved];
- (2) The owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall have a CAIR Part included in the Title V operating permit issued by the DEP under 40 CFR Part 96, Subpart CCC, for the source and operate the source and each CAIR unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

- (1) The owners and operators, and the CAIR designated representative, of each CAIR SO₂ source and each SO₂ CAIR unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHH, and Rule 62-296.470, F.A.C.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHH, shall be used to determine compliance by each CAIR SO₂ source with the following CAIR SO₂ Emission Requirements.

SO₂ Emission Requirements.

- (1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent in CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with 40 CFR 96.254(a) and (b), not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHH.
- (2) A CAIR SO₂ unit shall be subject to the requirements under paragraph (1) of the Sulfur Dioxide Emission Requirements starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.270(b)(1) or (2) and for each control period thereafter.
- (3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the SO₂ Emission Requirements, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.
- (4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFF and GGG.
- (5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR Part, or an exemption under 40 CFR 96.205 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.
- (6) A CAIR SO₂ allowance does not constitute a property right.
- (7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart FFF or GGG, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR SO₂ unit.

Excess Emissions Requirements.

If a CAIR SO₂ source emits SO₂ during any control period in excess of the CAIR SO₂ emissions limitation, then:

- (1) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 40 CFR 96.254(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
- (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAA, the Clean Air Act, and applicable state law.

Brooksville Power Plant

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Department or the Administrator.

(i) The certificate of representation under 40 CFR 96.213 for the CAIR designated representative for the source and each CAIR SO₂ unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.213 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR SO₂ Trading Program.

(iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR SO₂ Trading Program or to demonstrate compliance with the requirements of the CAIR SO₂ Trading Program.

(2) The CAIR designated representative of a CAIR SO₂ source and each CAIR SO₂ unit at the source shall submit the reports required under the CAIR SO₂ Trading Program, including those under 40 CFR Part 96, Subpart HHH.

Liability.

(1) Each CAIR SO₂ source and each CAIR SO₂ unit shall meet the requirements of the CAIR SO₂ Trading Program.

(2) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ source or the CAIR designated representative of a CAIR SO₂ source shall also apply to the owners and operators of such source and of the CAIR SO₂ units at the source.

(3) Any provision of the CAIR SO₂ Trading Program that applies to a CAIR SO₂ unit or the CAIR designated representative of a CAIR SO₂ unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR SO₂ Trading Program, a CAIR Part, or an exemption under 40 CFR 96.205 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR SO₂ source or CAIR SO₂ unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

CAIR NO_x OZONE SEASON TRADING PROGRAM

CAIR Part Requirements.

(1) The CAIR designated representative of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall:

(i) Submit to the DEP a complete and certified CAIR Part form under 40 CFR 96.322 and Rule 62-296.470, F.A.C., in accordance with the deadlines specified in Rule 62-213.420, F.A.C.; and

(ii) [Reserved];

(2) The owners and operators of each CAIR NO_x Ozone Season source required to have a Title V operating permit or air construction permit, and each CAIR NO_x Ozone Season unit required to have a Title V operating permit or air construction permit at the source shall have a CAIR Part included in the Title V operating permit or air construction permit issued by the DEP under 40 CFR Part 96, Subpart CCCC, for the source and operate the source and the unit in compliance with such CAIR Part.

Monitoring, Reporting, and Recordkeeping Requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR Part 96, Subpart HHHH, and Rule 62-296.470, F.A.C.

(2) The emissions measurements recorded and reported in accordance with 40 CFR Part 96, Subpart HHHH, shall be used to determine compliance by each CAIR NO_x Ozone Season source with the following CAIR NO_x Ozone Season Emissions Requirements.

NO_x Ozone Season Emission Requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the control period under 40 CFR 96.354(a) in an amount not less than the tons of total NO_x emissions for the control period from all CAIR NO_x Ozone Season units at the source, as determined in accordance with 40 CFR Part 96, Subpart HHHH.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 96.370(b)(1),(2), or (3) and for each control period thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under paragraph (1) of the NO_x Ozone Season Emission Requirements, for a control period in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with 40 CFR Part 96, Subparts FFFF and GGGG.

(5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR Part, or an exemption under 40 CFR 96.305 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_x Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under 40 CFR Part 96, Subpart EEEE, FFFF or GGGG, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season unit's compliance account is incorporated automatically in any CAIR Part of the source that includes the CAIR NO_x Ozone Season unit.

STEP 3,
Continued

Brooksville Power Plant

Excess Emissions Requirements.

If a CAIR NO_x Ozone Season source emits NO_x during any control period in excess of the CAIR NO_x Ozone Season emissions limitation, then:
 (1) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 40 CFR 96.354(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable state law; and
 (2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR Part 96, Subpart AAAAA, the Clean Air Act, and applicable state law.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the DEP or the Administrator.
 (i) The certificate of representation under 40 CFR 96.313 for the CAIR designated representative for the source and each CAIR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 40 CFR 96.113 changing the CAIR designated representative.
 (ii) All emissions monitoring information, in accordance with 40 CFR Part 96, Subpart HHHH, of this part, provided that to the extent that 40 CFR Part 96, Subpart HHHH, provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Ozone Season Trading Program.
 (iv) Copies of all documents used to complete a CAIR Part form and any other submission under the CAIR NO_x Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) The CAIR designated representative of a CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall submit the reports required under the CAIR NO_x Ozone Season Trading Program, including those under 40 CFR Part 96, Subpart HHHH.

Liability.

(1) Each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall meet the requirements of the CAIR NO_x Ozone Season Trading Program.
 (2) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season source or the CAIR designated representative of a CAIR NO_x Ozone Season source shall also apply to the owners and operators of such source and of the CAIR NO_x Ozone Season units at the source.
 (3) Any provision of the CAIR NO_x Ozone Season Trading Program that applies to a CAIR NO_x Ozone Season unit or the CAIR designated representative of a CAIR NO_x Ozone Season unit shall also apply to the owners and operators of such unit.

Effect on Other Authorities.

No provision of the CAIR NO_x Ozone Season Trading Program, a CAIR Part, or an exemption under 40 CFR 96.305 shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Ozone Season source or CAIR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved State Implementation Plan, a federally enforceable permit, or the Clean Air Act.

**STEP 3,
Continued**

STEP 4

Certification (for designated representative or alternate designated representative only)

Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the CAIR source or CAIR units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Terry Woodard	Title Plant Manager
Company Owner Name Florida Power Development LLC	
Phone 352-799-7881	E-mail Address wwoodard@deltapowerservices.com
Signature 	Date 6-25-14

Clean Air Interstate Rule (CAIR) Program

Instructions for CAIR Part Form

(40 CFR 96.121, 96.122, 96.221, 96.222, 96.321, 96.322,
and Rule 62-296.470, F.A.C.)

The CAIR Program requires the designated representative or alternate designated representative to submit a CAIR Part form for each source with a CAIR unit. A complete Certificate of Representation must be received by EPA before the CAIR Part form is submitted to the DEP Bureau of Air Regulation.

DEFINITIONS:

- "CAIR" – Clean Air Interstate Rule
- "CFR" - Code of Federal Regulations
- "DOE" - U.S. Department of Energy
- "EIA" – U.S. Energy Information Agency
- "F.A.C." - Florida Administrative Code
- "DEP" - Florida Department of Environmental Protection
- "NO_x" – Nitrogen oxides
- "ORIS" - Office of Regulatory Information Systems
- "SO₂" – Sulfur dioxide

Please type or print. The alternate designated representative may sign in lieu of the designated representative. If assistance is needed, contact the DEP Bureau of Air Regulation at (850) 488-0114.

- STEP 1** Use the plant name and ORIS Code listed on the Certificate of Representation for the plant. An ORIS code is a 4-digit number assigned by the EIA at the DOE to power plants owned by utilities. If the plant is not owned by a utility but has a 5-digit plant code (also assigned by EIA), use the plant code. If no code has been assigned or if there is uncertainty regarding what the code number is, contact EIA at (202) 586-2402.
- STEP 2** For column "a," identify each CAIR unit at the CAIR source by providing the appropriate unit identification numbers, consistent with the unit identification numbers entered on the Certificate of Representation and with unit identification numbers used in reporting to DOE and/or EIA. For new units without identification numbers, owners and operators may assign such numbers consistent with EIA and DOE requirements. For columns "b," "c," and "d," indicate to which CAIR program(s) each unit is subject by placing an "X" in the column(s). For columns "e" and "f," enter the expected commence commercial operation date(s) and expected monitor certification deadline(s) for new units in accordance with 40 CFR 96.102, 96.202, and 96.302; and 40 CFR 96.170(b), 96.270(b), and 96.370(b), respectively.
- STEP 3** Read the standard requirements.
- STEP 4** Read the certification statement; provide name, title, owner company name, phone, and e-mail address; sign, and date.

Submission deadlines: See Rule 62-213.420, F.A.C.

Submit this form to: DEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

Attachment 2

Initial Title V Application
Florida Power Development, LLC; Facility ID: 0530380
Location: Brooksville, Florida

CAM PLAN

Florida Power Development, LLC
Title V permit: 0530380-002-AV
ATTACHMENT CAM

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN FOR
EU 002 – Woody-Biomass Fueled Grate-Suspension Boiler

I. **Background**

a. **Emissions Unit**

Description: Woody Biomass-Fueled Grate Suspension Boiler

EU Identification: EU 002

Facility: Florida Power Development, LLC;
Brooksville, Florida

b. **Applicable Regulations, Emission Limits, and Monitoring Requirements**

Permit No.: 0530380-002-AV

Regulated Pollutant: PM

Emission Limit: PM/PM₁₀: 11.7 lb/hr (stack test compliance)

Monitoring: Surrogate required to continuously monitor opacity.

c. **Control Technology**

The biomass boiler utilizes a number of control technologies to limit pollution emissions. This includes:

PM - An electrostatic precipitator (ESP) to control PM/PM₁₀/PM_{2.5}

II. Monitoring Approach

I. Pollutants	PM
Measurement Approach	Continuous Opacity Monitoring (COMS)
II. Indicator Range	An excursion is defined as a 6-min block opacity reading greater than 10% during normal operation.
III. Performance Criteria	
A. Data Representativeness	Based on available data under normal operations, the expected range of the 6-min block reading of opacity is 10% or less.
B. Verification of Operational Status	Daily calibrations and quarterly auditing.
C. QA/QC Practices	The COMs systems are audited quarterly.
Frequency	Opacity is monitored continuously.
E. Data Collection Procedures	Opacity is recorded at least once per minute. 6-min blocks
F. Averaging Period	6 min blocks

Justification

a. Background

The emission unit is a woody biomass-fueled grate suspension boiler. Control equipment includes an oxidation catalyst, ammonia injection into an SCR reactor, an in-duct sorbent injection system and an electrostatic precipitator. PM is tested yearly via a stack test and opacity is monitored via a COMS.

b. Rationale for Selection of Performance Indicators

The COMS unit, for opacity, will provide adequate indication to FPD if the control equipment is running properly.

40 CFR 64.3 Monitoring design criteria.

(d) Special criteria for the use of continuous emission, opacity or predictive monitoring systems. (1) If a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS) is required pursuant to other authority under the Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part.

40 CFR 64.3(d) (shown above) of the CAM rule indicates that COMS satisfy the monitoring requirements and further justification for their use is not required.

c. Rationale for Selection of Indicator Ranges

The indicator ranges for PM for the woody biomass-fueled grate suspension boiler can be monitored using the COMS system for opacity as a surrogate. An excursion of the allowable opacity triggers an inspection, corrective action, and a reporting requirement. The values from the COMS are continuously recorded and a six minute block average is determined for compliance.

Attachment 3

**Request to remove requirement for Ammonia Slip Testing
Florida Power Development, LLC; Facility ID: 0530380
Location: Brooksville, Florida**

Results of Initial Compliance Testing for NH₃ Slip

Table 1. Initial Compliance Stack Testing Results.

SUMMARY OF PM, SAM, NH3 and VOC EMISSION MEASUREMENTS

Florida Power Development, LLC EU-002 Power Plant Boiler Stack Permit No.: 0530380-001-AC										
EPA Test Method Conducted	Test Run Number	Date and Times of Test	Heat input rate (mmbtu/hr) ¹	Stack Gas Flow Rate (acfm)	Stack Gas Flow Rate (dscfm)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Stack Gas Oxygen (%)	Measured Emissions	Allowable Emission Limits
EPA Test Method 5 (PM)	1	3/31/2014 10:05-11:11	808.1	319,472	173,567	338.0	18.5%	13.0%	9.25	lb/hr
	2	3/31/2014 16:00-17:06	777.5	318,179	173,645	342.0	17.6%	10.0%	7.84	lb/hr
	3	3/31/2014 17:42-18:46	768.9	323,328	172,171	344.0	19.4%	8.8%	9.04	lb/hr
Test Average			784.8	320,326	173,127.7	341.3	0.2	0.1	8.71	lb/hr
EPA Test Method 8 (SAM)	1	4/1/2014 08:09-09:20	807.2	328,220	182,978	344.0	16.0%	9.0%	1.83	lb/hr
	2	4/1/2014 10:13-11:29 ³	794.5	327,111	182,459	344.0	15.6%	9.6%	1.73	lb/hr
	3	4/1/2014 12:18-13:26	691.2	328,355	174,750	346.0	19.3%	9.8%	1.64	lb/hr
Test Average			764.3	327,895	180,062	344.7	17.0%	9.5%	1.73	lb/hr
EPA Test Method 027 (Ammonia Slip) ²	1	4/1/2014 15:28-16:40	808.1	331,356	181,383	348.0	16.9%	10.8%	0.06	ppmv @ 7% O ₂
	2	4/1/2014 17:04-18:14	760.0	320,586	171,217	346.0	19.0%	10.3%	0.02	ppmv @ 7% O ₂
	3	4/1/2014 18:31-19:40	815.1	335,117	186,363	347.0	15.7%	10.9%	0.01	ppmv @ 7% O ₂
Test Average			794.4	329,020	179,654	347.0	17.2%	10.7%	0.03	ppmv @ 7% O ₂
EPA Test Method 25A (VOC)	1	4/1/2014 08:09-09:11	806.2	328,220	182,978	344.0	16.0%	9.0%	0.44	lb/hr
	2	4/1/2014 10:13-11:15	790.4	327,111	182,459	344.0	15.6%	9.6%	0.31	lb/hr
	3	4/1/2014 12:28-13:20	682.9	328,355	174,750	346.0	19.3%	9.8%	0.25	lb/hr
Test Average			759.8	327,895	180,062	344.7	17.0%	9.5%	0.33	lb/hr

1. Heat input rate determined according to permit condition Section B.21(c)
 2. Ammonia lab measurements non-detect. Emissions are calculated using lab detection limit concentrations.
 3. Process malfunction (chain broke on reclaimer disk screen) fuel feed system stopped at 11:15. Power production drops at 11:30. Heat input rate based on 10:13 to 11:29.